

EXHIBIT B

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GREENE ENGINEERING COMPANY, INC.

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PROFESSIONAL ENGINEER

"SPECIALIST IN FORENSIC, SAFETY, & DESIGN ENGINEERING"

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January 17, 2006

THE CARLILE LAW FIRM, LLP
400 S. Alamo Street
Marshall, Texas 75672

Re: Christopher Lynn Castillo et al. vs. Ford Motor Company;
United States District Court, Eastern District of Texas; Marshall Division

Attn: Bruce A Craig, Attorney

Dear Mr. Craig:

Pursuant to your request, this engineer has reviewed the facts of the vehicular accident of Nicasio Micky Castillo. Based on my review of materials provided and my inspection of the vehicle on December 27, 2005, I offer the following:

Background: This case involves a single car collision which occurred in Nacogdoches, Texas on May 9, 2003. According to reports from the driver, he was traveling East on State Highway 21 and the car wandered off the road to the right. When he steered back onto the road, it felt like the front end fell out from under the car, he lost steering input, and the car veered sharply off the road to his left, and rolled over. The car was occupied by four boys. The driver, Nicasio Castillo, then age 17; J.C. Brittain (17) in the front right seat; Juan Barron (14) in the rear left seat; and Chris Castillo (16) in the right rear position. Each of the occupants was reported belted and shoulder strapped at the time of the accident. Each reportedly suffered injuries in the accident.

Vehicle Configuration: The vehicle involved was a 1995 Ford escort hatchback sedan. The front suspension is a McPherson Strut configuration. This is currently, the most widely used front suspension system in cars of European origin. The system basically comprises of a strut-type spring and shock absorber combo, which pivots on a ball joint on the single, lower arm. The strut itself is the load-bearing member in this assembly, with the spring and shock absorber merely performing their duty as opposed to actually holding the car up. In the Escort application, the top of the strut extends through and is attached to a rubber bushing suspended in a gimbal which attaches the piston of the strut and forms the connection between the wheel hub and the

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vehicle body. The bushing is an active part of the suspension system from the standpoint that it acts to allow flexibility of the strut at the point which it is connected to the vehicle body as centrifugal forces act on the suspension when the vehicle is turned left or right while in motion. In essence, the bushing allows the suspension some flexibility to flex from its connection to the vehicle body in turns.

Vehicle Condition: The Escort involved in this incident reflects complete separation of the strut assembly from the gimbal bushing which should act to attach the strut assembly to the vehicle body. The rubber reveals that it fractured along stress cracks. The rubber reflects to have been fractured for a considerable time by reason of the existence of friction burning or melting on the rubber. In failing, the strut assembly folded up underneath the vehicle body with such force that the top of the strut assembly burst through the sheet metal of the front fender. Inspection of the right strut gimbal and bushing reveals similar stress cracks and fracturing. I anticipate removing the right and left struts for further testing, but have not at this point based on the need to preserve the integrity of the evidence, and to allow participation of the other parties in any part removals or other activities which could possibly be regarded as destructive testing by the Court.

Opinions: I intend to offer the following opinions at the time of trial of this lawsuit. Because of the need for destructive testing the parts involved with the permission of the Court, these opinions should be considered preliminary. These opinions are stated in terms of reasonable engineering probability.

(1) The failure of the left McPherson strut gimbal bushing as reflected by the condition of this vehicle resulted in the loss of steering input described by Nicasio Castillo when he attempted to apply corrective action to bring the vehicle back onto the road after it had wandered off the road to the right.

(2) Once the steering of the vehicle was affected by the strut failure, there would have been a complete loss of control of the vehicle, and it would have veered sharply off the road to the left.

(3) The right strut gimbal bushing reflects similar stress cracking.

(4) Based on the design of the strut assembly, it was foreseeable to Ford Motor Company that the stresses placed on the gimbal bushing in the normal function it served in the design of the suspension of the automobile would be such that stress cracking could, and indeed, would occur.

(5) It was also foreseeable to Ford Motor Company that a failure of the gimbal bushing could result in disconnection of the top of the strut from the body of the vehicle and lead to a complete suspension failure.

(6) Ford Motor Company could easily have fashioned a remedy to the problem by including a washer to prevent the strut assembly from coming out of position in the event of a failure of the gimbal bushing.

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(7) In addition, the flexing of the strut against the gimbal bushing could have been reduced or eliminated by the inclusion of a strut tower brace. A strut tower brace is a recognized and accepted suspension component part, the purpose of which is to substantially reduce flexing of the strut at the gimbal.

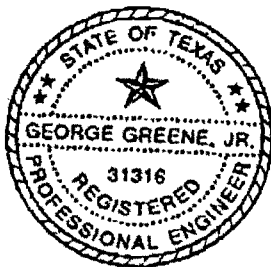
(8) Ford Motor Company had such a part available for the 1995 model Ford Escort. The inclusion of a washer assembly to prevent the strut from coming apart from the strut tower at the point of its attachment at the gimbal bushing, or a strut tower brace on the vehicle in question, more likely than not, would have prevented this unfortunate accident.

(9) I reserve the right to make further opinions in this matter, or to revise these opinions once I have been afforded the opportunity to perform further testing involving the removal of the component parts at issue in this case.

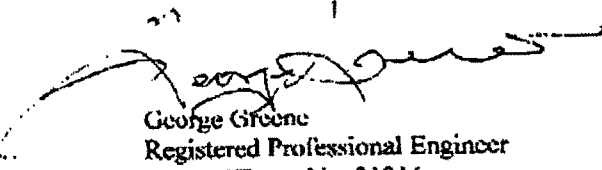
(10) The failure to include a washer assembly or strut tower brace on the 1995 Ford Escort resulted in rendering the vehicle defective and unreasonably dangerous due to the likelihood of loss of control of the vehicle in the event of failure of the bushing.

(11) The failure to warn of the need to inspect the gimbal bushing at the strut tower on a regular and frequent basis rendering the vehicle defective and unreasonably dangerous due to the likelihood of loss of control of the vehicle in the event of failure of the bushing.

Additional opinions may be forthcoming after disassembly and further inspection of the components.



Respectfully submitted,


George Greene
Registered Professional Engineer
State of Texas No. 31316

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